



# Town of Dracut

TOWN HALL  
62 ARLINGTON STREET  
DRACUT, MASSACHUSETTS 01826

Board of Selectman  
License Commissioners

Tony Archinski, Chairman  
Alison Hughes, Vice Chairwoman  
Tami Dristliaris, Clerk  
Joseph DiRocco, Jr.  
Cathy Richardson

TEL: 978-452-1908

FAX: 978-452-7924

Email: [boardofselectmen@dracutma.gov](mailto:boardofselectmen@dracutma.gov)

December 17, 2015

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington, DC 20426

Reference: Docket No. CP16-21-000 – Comments from Dracut Board of Selectmen, Dracut, Massachusetts

Dear Secretary Bose,

The Town of Dracut, Massachusetts is identified as a proposed site for a natural gas compressor station, two new metering stations, three new laterals in addition to a main line, alongside an already existing gas pipeline infrastructure.

Therefore we request the following concerns be taken into serious consideration:

- (1) **Public Safety:** How will the dense population, *especially children*, in East Dracut and nearby places of assembly (St. Francis Church, Campbell Elementary School), and first response station (Jones Avenue Fire Station) be affected in the event of a catastrophic event caused by operator error, system failure, or breach of the system due to a terrorist attack?

**Note:** *The Joseph A. Campbell Elementary School, 1021 Methuen Street, Dracut, MA 01826 accommodates approximately 500 children (including staff) from September through June. Summer programs are also offered.*

- (2) **Agricultural Impact:** Determine protections for Dracut farms that are engaged in major food production operations throughout Merrimack Valley and beyond, and committed to natural growing practices for sustainability. Examples: The New Entry

- (3) Sustainable Farming Project/Dracut Land Trust, Corey Pride Farm, Ogonowski Farm, Brox Farm, Dumaresq Farm, and Saja Farm.

**Keeping free from contamination:**

- a. Waterways, aquifers, artesian wells, vernal pools, and wetlands which traverse these lands.
- b. Above ground crops subject to airborne particulates.

- (4) **Accountability:** Who will monitor Kinder Morgan, the for-profit, privatized corporation which professes to adhere to any and all agency regulations?
- (5) **Response Time:** What guarantee is in place to assure Kinder Morgan will respond in a timely manner to residents' complaints of gas odor, excessive noise levels, or evidence of health effects not previously experienced?
- (6) **Environmental Changes:** How will this proposed infrastructure impact wildlife corridors, wild life sanctuaries, and wildlife ecosystems? How can we be assured Kinder Morgan will not permanently disrupt these natural habitats? Which agencies will examine the long term effect of changes to these ecosystems? Impact on rare species?
- (7) **Long Term Undetermined Health Effects:** How will the proposed infrastructure impact the general population as a whole? What is the risk of these effects on the entire Merrimack Valley? What is the long term risk to waterways, tributaries, brooks, and the like which seep into underground aquifers and artesian well systems?
- (8) **Emissions:** We request baseline studies be performed prior to any approval of a project this type to assure no person/persons, pregnant women, or gestating animals (including wildlife) are subject to exposure of emissions that would contribute to undue upper respiratory distress, cardiovascular stress, or other adverse long term health effects, including those conditions aggravated by fugitive emissions and VOCs (volatile organic chemicals).
- Note:** *We recommend that baseline testing be conducted by a third party company with no ties to Kinder Morgan.*
- (9) **Examination of Contaminants at 970 Broadway Road, Dracut:**
- a. We request any and all findings from studies performed seeking information about pre-existing contamination to the proposed compressor site location (970 Broadway Road, Dracut, MA 01826) be disclosed to the Dracut Board of Health and town residents prior to construction.
  - b. We request the parameters of testing include the testing of all contaminants which may be present on the proposed install site.

- c. We request that testing for contaminants not be limited to only those contaminants of the applicant's choosing (petroleum based only).
- d. We specifically request testing include testing for chlorinated solvents and any other chemicals named in tests previously conducted on the proposed site.

(10) **Noise Pollution:** Identify all equipment, operations, and procedures, both ongoing and at random which may produce audible noise outside the metering station(s) and compressor station, noting the maximum noise level which may be emitted individually or collectively during normal operations, peak operation, or during unplanned "events".

**Noise Baselines:**

- a. Identify all noise-sensitive areas within at least one-half mile radius of the proposed metering stations and compressor station where a quiet setting is a reasonable attribute (including but not limited to residential, educational, health, religious, recreational, agricultural areas, wildlife refuges, cultural, and historic sites).
- b. Accurately identify baseline noise in conjunction with detached third party intervention.
- c. Surveys should be conducted over a period of weeks during winter months when seasonal noise is not present.
- d. Include all affected locations (including those identified in (2) Public Safety) along with East Richardson Preserve, Dunlap Sanctuary, and Dennis McNamara Way.
- e. Post-construction: Conduct noise surveys within one month of the in-service date to assure compliance with all noise regulations.
- f. Post-construction: Perform annual noise surveys during winter months.

(11) **Industrial Lighting:** Determine the impact of high intensity 24X7 industrial lighting on nearby residents, wildlife, wildlife corridors, nocturnal animals (reproductive cycles, foraging habits), and migratory birds.

(12) **Leaks/Maintenance:**

Kinder Morgan has stated to elected officials in Merrimack, NH:

**"All compressor and metering stations along pipeline routes are monitored remotely from a 24 hour control center. "**

**"If a leak is detected which does not present a safety concern, classified as a non-hazardous leak, an appropriate repair plan would be developed."**

**Note:** This is deemed unacceptable. Any leak is regarded to be both a safety and environmental concern. The currently proposed compressor station location places at

risk: wetlands feeding into local farmland, underground aquifers tied to artesian wells, and the local Campbell Elementary School (approximately 500 students, including staff).

**We request Kinder Morgan to act as follows:**

- a. Quantify, in detail, chemicals that can possibly be emitted from any and all metering stations, pumping station(s), and compressor station(s).
- b. Disclose projections of any and all emissions pertaining to future leaks of the system and intentional/unintentional venting of the system.
- c. Quantify the effects to human health and welfare regarding the number of people potentially exposed to the emission and the number of people who may develop adverse health effects from exposure to emissions.
- d. Identify all adverse health risks to the public and wildlife.
- e. Identify the adverse effects to sensitive populations, including but not limited to: children, residents with lung diseases (such as asthma, emphysema, COPD, chronic bronchitis), elderly, and handicapped individuals.
- f. Quantify the long term, indirect health costs associated with effects to human health and welfare, including costs for long term health care, insurance costs, loss of wages, unemployment insurance, and loss of productivity.
- g. Include a separate evaluation of all of the above regarding farming operations (also previously listed), especially those farms under the Agricultural Preservation Restriction.
- h. Detail compliance with the National Emissions Standards for Hazardous Air Pollutants and how compliance with these standards will be independently monitored through third party intervention in order to hold Kinder Morgan immediately accountable for non-compliance.
- i. Detail and evaluate all emission control alternatives for all proposed stations to ensure system controls cannot be compromised, creating a ***“soft” target for terrorism.***

**To ensure maximum security:**

- i. Install proper check valve system to guard against backflow.
  - ii. Reduce distance between shut-off valves (from typical 4 to 5 mile span) to as minimal distance as possible.
  - iii. Establish a control center directly in Dracut to eliminate dependency on out of town control centers and headquarters located in Texas.
- j. Include specific health based and epidemiological criteria to determine significance to air quality.
  - k. Determine which agency will monitor such activity.
  - l. Determine a decommissioning plan should an installed pipeline or any other component be deemed “no longer necessary.”
  - m. Describe reductions-by-design, emission control procedures, emission offsets, and any mitigation which can be implemented to reduce impacts on air quality and water quality.

(13) **Quarry Operations:**

- a. The proposed pipeline infrastructure by Kinder Morgan comes precariously close to an active quarry. Given the safety concerns by nearby residents, what practices would be in place to prevent damage to the existing pipeline? Who can serve as an independent third party witness to assure compliance with such practices?
- b. How can residents be assured that an active quarry poses no threat to leakages or explosions directly caused by quarry activity?
- c. To assure local quarry owners that their interests are protected and that owners are not held liable for any injury or damage to the pipeline secondary to Kinder Morgan's desire to place their pipeline near a blasting zone, we request a long term study, including detailed blasting records with seismic data to determine the overall effect of this type of blasting from this said location on the pipeline infrastructure proposed for Dracut.

(14) **Ongoing Maintenance:**

**Note:** *Several cases being reviewed demonstrate that proper maintenance of existing pipeline infrastructure is deficient.*

**Therefore we request the following:**

- a. Analysis of the construction and maintenance of all stations, including details on visual impacts on surrounding properties.
- b. Detailed analysis of lighting, impact on surrounding properties, including agricultural operations, and wildlife refuges.
- c. Detailed analysis of emergency planning and emergency response procedures.
- d. Detailed analysis of safety measures, as in installation of a fast-acting shutdown valve upstream and check valve downstream to prevent backflow.
- e. Details regarding impacts to endangered species and/or threatened endangerment to such species, and mitigation regarding the same.
- f. Detailed use of non-chemical and chemical vegetation control, given stations are closely located to wells, wetlands, and underground aquifers.
- g. Specific details about all chemicals and/or substances to be stored at any facility and how these chemicals/substances will be extracted and removed along with inspection by independent third party(s) to assure operations are performed without risk to the general population.
- h. Details regarding the de-commissioning of the infrastructure should this become necessary, who will inspect and oversee the de-commissioning of such facilities, and

who will be held accountable for any costs associated with de-commissioning as well as environmental cleanup.

- i. State mechanisms and processes ~~as~~ needed to assure residents, farming operations, and businesses are not negatively impacted.

**(15) Use of Existing Infrastructure in Lieu of New Proposed Laterals:**

- a. Acknowledge the existing Joint Facilities Pipeline from Dracut to Methuen and Methuen to Beverly (reference the FERC Docket No. CPD 97-238) which already provides sufficient capacity to serve both proposed and future project customers.
- b. Given this existing pipeline infrastructure (jointly owned by Spectra and Transcanada subsidiaries) provides a 30 inch (1440 psi) pipeline constructed in year 2000, create a plan to use this pipeline in lieu of the proposed Lynnfield Lateral and Haverhill Lateral expansion.

Thank you for your attention to these matters. We look forward to your response.


Respectfully submitted,



Tony Archinski, Chairman



Alison Hughes, Vice Chairwoman



Tami M. Dristiliaris, Clerk



Joseph DiRocco, Jr., Member



Cathy Richardson, Member

cc: Attorney James Hall, Dracut Town Counsel  
Massachusetts State Representative Colleen Garry  
State Senator Barbara L'Italien  
Congresswoman Niki Tsongas  
US Senator Ed Markey  
US Senator Elizabeth Warren